

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Star Energy Partners LLC, d/b/a None, for approval to offer, render, furnish, or supply electricity or electric generation services as a(n) [as specified in item #4b below] to the public in the Commonwealth of Pennsylvania (Pennsylvania).

To the Pennsylvania Public Utility Commission:

1. IDENTIFICATION AND CONTACT INFORMATION

a. **IDENTITY OF THE APPLICANT:** Provide name (including any fictitious name or d/b/a), primary address, web address, and telephone number of Applicant:

Star Energy Partners LLC
3340 W. Market Street, Suite 100
Akron, OH 44333
(855) 427-7827; www.starenergypartners.com

b. **PENNSYLVANIA ADDRESS / REGISTERED AGENT:** If the Applicant maintains a primary address outside of Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's secondary office within Pennsylvania. If the Applicant does not maintain a physical location within Pennsylvania, provide the name, address, telephone number, and fax number of the Applicant's Registered Agent within Pennsylvania.

National Corporate Research, Ltd.
600 North 2nd Street
Harrisburg, PA 17101

c. **REGULATORY CONTACT:** Provide the name, title, address, telephone number, fax number, and e-mail address of the person to whom questions about this Application should be addressed.

Shannon Dieringer, Paralegal
3340 W. Market Street
Akron, OH 44333
(330) 835-2483; sdieringer@starenergypartners.com

d. **ATTORNEY:** Provide the name, address, telephone number, fax number, and e-mail address of the Applicant's attorney. If the Applicant is not using an attorney, explicitly state so.

Sandi Murphy, Legal Counsel
3340 W. Market Street
Akron, OH 44333
(330) 835-2664; smurphy@CanalPointe.com

e. **CONTACTS FOR CONSUMER SERVICE AND COMPLAINTS:** Provide the name, title, address, telephone number, FAX number, and e-mail of the person and an alternate person responsible for addressing customer complaints. These persons will ordinarily be the initial point(s) of contact for resolving complaints filed with the Applicant, the Electric Distribution Company, the Pennsylvania Public Utility Commission, or other agencies. The main contact's information will be listed on the Commission website list of licensed EGSs.

Shannon Dieringer, Paralegal
3340 W. Market Street
Akron, Ohio 44333
P (330) 835-2483; F (866) 540-8518
Email: complaints@starenergypartners.com

Brandiann Portillo, Customer
Operations Manager
3340 W. Market Street, Suite 100
Akron, Ohio 44333
P (330) 436-5867
Email: bportillo@starenergypartners.com

2. BUSINESS ENTITY FILINGS AND REGISTRATION

a. **FICTITIOUS NAME:** *(Select appropriate statement and provide supporting documentation as listed.)*

The Applicant will be using a fictitious name or doing business as ("d/b/a")

Provide a copy of the Applicant's filing with Pennsylvania's Department of State pursuant to 54 Pa. C.S. §311, Form PA-953.

or

The Applicant will not be using a fictitious name.

b. **BUSINESS ENTITY AND DEPARTMENT OF STATE FILINGS:**

(Select appropriate statement and provide supporting documentation. As well, understand that Domestic means being formed within Pennsylvania and foreign means being formed outside Pennsylvania.)

The Applicant is a sole proprietor.

- If the Applicant is located outside the Commonwealth, provide proof of compliance with 15 Pa. C.S. §4124 relating to Department of State filing requirements.

or

The Applicant is a:

- domestic general partnership (*)
- domestic limited partnership (15 Pa. C.S. §8511)
- foreign general or limited partnership (15 Pa. C.S. §4124)
- domestic limited liability partnership (15 Pa. C.S. §8201)
- foreign limited liability general partnership (15 Pa. C.S. §8211)
- foreign limited liability limited partnership (15 Pa. C.S. §8211)

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above.
- Give name, d/b/a, and address of partners. If any partner is not an individual, identify the business nature of the partner entity and identify its partners or officers.
- Provide the state in which the business is organized/formed and provide a copy of the Applicant's charter documentation.
- * If a corporate partner in the Applicant's domestic partnership is not domiciled in Pennsylvania, attach a copy of the Applicant's Department of State filing pursuant to 15 Pa. C.S. §4124.

or

The Applicant is a:

- domestic corporation (15 Pa. C.S. §1308)
- foreign corporation (15 Pa. C.S. §4124)
- domestic limited liability company (15 Pa. C.S. §8913)
- foreign limited liability company (15 Pa. C.S. §8981)
- Other (Describe):

- Provide proof of compliance with appropriate Department of State filing requirements as indicated above. See Attached 2.b.i.
- Provide the state in which the business is incorporated/organized/formed and provide a copy of the Applicant's charter documentation. See Attached 2.b.i.
- Give name and address of officers.
See Attached 2.b.ii.

3. AFFILIATES AND PREDECESSORS

(both in state and out of state)

- a. **AFFILIATES:** Give name and address of any affiliate(s) currently doing business and state whether the affiliate(s) are jurisdictional public utilities. If the Applicant does not have any affiliates doing business, explicitly state so. Also, state whether the applicant has any affiliates that are currently applying to do business in Pennsylvania.

None

- b. **PREDECESSORS:** Identify the predecessor(s) of the Applicant and provide the name(s) under which the Applicant has operated within the preceding five (5) years, including address, web address, and telephone number, if applicable. If the Applicant does not have any predecessors that have done business, explicitly state so.

Star Energy Partners has no predecessors that have done business in Pennsylvania.

4. OPERATIONS

a. **APPLICANT'S PRESENT OPERATIONS:** *(select and complete the appropriate statement)*

Definitions

- Supplier – an entity that sells electricity to end-use customers utilizing the jurisdictional transmission and distribution facilities of an EDC.
- Aggregator - an entity that purchases electric energy and takes title to electric energy as an intermediary for sale to retail customers.
- Broker/Marketer - an entity that acts as an intermediary in the sale and purchase of electric energy but does not take title to electric energy.

- The Applicant is presently doing business in Pennsylvania as a
- municipal electric corporation
 - electric cooperative
 - local gas distribution company
 - provider of electric generation, transmission or distribution services
 - broker/marketer engaged in the business of supplying electricity services
 - Other; Identify the nature of service being rendered.

or

- The Applicant is not presently doing business in Pennsylvania.

b. **APPLICANT'S PROPOSED OPERATIONS:** The Applicant proposes to operate as a *(may check multiple)*:

- Generator of electricity
- Supplier of electricity
- Aggregator engaged in the business of supplying electricity
- Broker/Marketer engaged in the business of supplying electricity services
 - Check here to verify that your organization will not be taking title to the electricity nor will you be making payments for customers.
- Electric Cooperative and supplier of electric power
- Other (Describe):

- c. **PROPOSED SERVICES:** Describe in detail the electric services or the electric generation services which the Applicant proposes to offer.

Star Energy Partners intends to supply electricity and electricity renewables, as well as energy analytics and diagnostics and energy efficiency related products and services to Residential, Small Commercial and Industrial, and Medium Commercial and Industrial consumers in all applicable territories in Pennsylvania.

- d. **PROPOSED SERVICE AREA:** Check the box of each Electric Distribution Company for which the Applicant proposes to provide service.

- | | |
|---|---|
| <input type="checkbox"/> Citizens' Electric | <input type="checkbox"/> Pike |
| <input type="checkbox"/> Duquesne Light | <input type="checkbox"/> PPL |
| <input type="checkbox"/> Met-Ed | <input type="checkbox"/> UGI Utilities |
| <input type="checkbox"/> PECO | <input type="checkbox"/> Wellsboro |
| <input type="checkbox"/> Penelec | <input type="checkbox"/> West Penn |
| <input type="checkbox"/> Penn Power | <input checked="" type="checkbox"/> Entire Commonwealth of PA |

- e. **CUSTOMERS:** Applicant proposes to provide services to:

- Residential Customers
- Small Commercial Customers - (25 kW and Under)
- Residential and Small Commercial as Mixed Meter **ONLY (CANNOT BE TAKEN WITH RESIDENTIAL AND/OR SMALL COMMERCIAL ABOVE)**
- Large Commercial Customers - (Over 25 kW)
- Industrial Customers
- Governmental Customers
- All of above
- Other (Describe):

- f. **START DATE:** Provide the approximate date the Applicant proposes to actively market within the Commonwealth.

March 1, 2015

5. COMPLIANCE

- a. **CRIMINAL/CIVIL PROCEEDINGS:** State specifically whether the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, has been or is currently the defendant of a criminal or civil proceeding within the last five (5) years.

Identify all such proceedings (active or closed), by name, subject and citation; whether before an administrative body or in a judicial forum. If the Applicant has no proceedings to list, explicitly state such.

None

- b. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any such proceedings listed above.

Not Applicable

- c. **CUSTOMER/REGULATORY/PROSECUTORY ACTIONS:** Identify all formal or escalated actions or complaints filed with or by a customer, regulatory agency, or prosecutory agency against the Applicant, an affiliate, a predecessor of either, or a person identified in this Application, for the prior five (5) years, including but not limited to customers, Utility Commissions, and Consumer Protection Agencies such as the Offices of Attorney General. If the Applicant has no actions or complaints to list, explicitly state such.

See Attached 5.c.

- d. **SUMMARY:** If applicable; provide a statement as to the resolution or present status of any actions listed above.

Resolved and closed to the satisfaction of the agencies and customers.

6. PROOF OF SERVICE

(Example Certificate of Service is attached at Appendix C)

- a. **STATUTORY AGENCIES:** Pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14, provide proof of service of a signed and verified Application with attachments on the following:

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Office of the Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

See Attached Appendix C.

- b. **EDCs:** Pursuant to Sections 1.57 and 1.58 of the Commission's Regulations, 52 Pa. Code §§1.57 and 1.58, provide Proof of Service of the Application and attachments upon each of the Electric Distribution Companies the Applicant proposed to provide service in. Upon review of the Application, further notice may be required pursuant to Section 5.14 of the Commission's Regulations, 52 Pa. Code §5.14. Contact information for each EDC is as follows.

West Penn:

Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

PECO:

Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Duquesne Light:

Regulatory Affairs
Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

PPL:

Legal Department
Attn: Paul Russell
PPL
Two North Ninth Street
Allentown, PA 18108-1179

Met-Ed, Penelec, and Penn Power:

Legal Department
First Energy
2800 Pottsville Pike
Reading PA, 19612

UGI:

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
Post Office Box 12677
Reading, Pa 19612-2677

Citizens' Electric Company:

Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Pike County Light & Power Company:

Director of Customer Energy Services
Orange and Rockland Company
390 West Route 59
Spring Valley, NY 10977-5300

Wellsboro Electric Company:

Wellsboro Electric Company
Attn: EGS Coordination
33 Austin Street
P. O. Box 138
Wellsboro, PA 16901

See Attached Appendix C.

7. FINANCIAL FITNESS

a. **BONDING:** In accordance with 66 Pa. C.S. Section 2809(c)(1)(i), the Applicant is required to file a bond or other instrument to ensure its financial responsibilities and obligations as an EGS. Therefore, the Applicant is...

- Furnishing the **original** of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$250,000. See Attached Appendix D.
- Furnishing the **original** of another initial security for Commission approval, to ensure financial responsibility.
- Filing for a modification to the \$250,000 requirement and furnishing the **original** of an initial bond, letter of credit or proof of bonding to the Commission in the amount of \$10,000. Applicant is required to provide information supporting an amount less than \$250,000. Such supporting information must include indication that the Applicant will not take title to electricity and will not pay electricity bills on behalf of its customers. Further details for modification may be described as well.

- *At the conclusion of Applicant's first year of operation it is the intention of the Commission to tie security bonds to a percentage of Applicant's gross receipts resulting from the sale of generated electricity consumed in Pennsylvania. The amount of the security bond will be reviewed and adjusted on an annual basis.*
- *Example version of a bond and letter of credit are attached at Appendix D & E, Applicant's security must follow language from these examples.*
- *Any deviation from these examples must be identified in the application and may not be acceptable to the Commission.*

b. **FINANCIAL RECORDS, STATEMENTS, AND RATINGS:** Applicant must provide sufficient information to demonstrate financial fitness commensurate with the service proposed to be provided. Examples of such information which may be submitted include the following:

- Actual (or proposed) organizational structure including parent, affiliated or subsidiary companies.
See Attached 7.b.i.
- Published Applicant or parent company financial and credit information (i.e. 10Q or 10K).
(SEC/EDGAR web addresses are sufficient) Not Applicable
- Applicant's accounting statements, including balance sheet and income statements for the past two years. See Attached 7.b.iii.
- Evidence of Applicant's credit rating. Applicant may provide a copy of its Dun and Bradstreet Credit Report and Robert Morris and Associates financial form, evidence of Moody's, S&P, or Fitch ratings, and/or other independent financial service reports. Not Applicable
- A description of the types and amounts of insurance carried by Applicant which are specifically intended to provide for or support its financial fitness to perform its obligations as a licensee.
See Attached 7.b.iv.
- Audited financial statements exhibiting accounts over a minimum two year period.
Not Applicable
- Bank account statement, tax returns from the previous two years, or any other information that demonstrates Applicant's financial fitness.

c. **SUPPLIER FUNDING METHOD:** If Applicant is operating as anything other than Broker/Marketer only, explain how Applicant will fund its operations. Provide all credit agreements, lines of credit, etc., and elaborate on how much is available on each item.

See Attached 7.c.

- d. **BROKER PAYMENT STRUCTURE:** If applicant is a broker/marketer, explain how your organization will be collecting your fees.

Not Applicable

- e. **ACCOUNTING RECORDS CUSTODIAN:** Provide the name, title, address, telephone number, FAX number, and e-mail address of Applicant's custodian for its accounting records.

Chad Yoder, Controller

3340 W. Market Street, Suite 100

Akron, Ohio 44333

(330) 436-5872; cyoder@starenergypartners.com

- f. **TAXATION:** Complete the TAX CERTIFICATION STATEMENT attached as Appendix F to this application.

All sections of the Tax Certification Statement must be completed. Absence (submitting N/A) of any of the TAX identifications numbers (items 7A through 7C) shall be accompanied by supporting documentation or an explanation validating the absence of such information.

Items 7A and 7C on the Tax Certification Statement are designated by the Pennsylvania Department of Revenue. Item 7B on the Tax Certification Statement is designated by the Internal Revenue Service.

See Attached Appendix D.

8. TECHNICAL FITNESS:

To ensure that the present quality and availability of service provided by electric utilities does not deteriorate, the Applicant shall provide sufficient information to demonstrate technical fitness commensurate with the service proposed to be provided.

- a. **EXPERIENCE, PLAN, STRUCTURE:** such information may include:

- Applicant's previous experience in the electricity industry.
See Attached 8.a.i.
- Summary and proof of licenses as a supplier of electric services in other states or jurisdictions.
See Attached 8.a.ii.
- Type of customers and number of customers Applicant currently serves in other jurisdictions.
See Attached 8.a.iii.
- Staffing structure and numbers as well as employee training commitments.
See Attached 8.a.iv. & 8.a.v.
- Business plans for operations within the Commonwealth.
See Attached 8.a.iv. & 8.a.v.
- Documentation of membership in PJM, ECAR, MAAC, other regional reliability councils, or any other membership or certification that is deemed appropriate to justify competency to operate as an EGS within the Commonwealth.
See Attached 8.a.vi.
- Any other information appropriate to ensure the technical capabilities of the Applicant.

b. PROPOSED MARKETING METHOD (*check all that apply*)

- Internal – Applicant will use its own internal resources/employees for marketing
- External EGS – Applicant will contract with a PUC **LICENSED EGS** broker/marketer
- Affiliate – Applicant will use a **NON-EGS** affiliate marketing company and or individuals.
- External Third-Party – Applicant will contract with a **NON-EGS** third party marketing company and or individuals
- Other (Describe):

c. DOOR TO DOOR SALES: Will the Applicant be implementing door to door sales activities?

- Yes
- No

If yes, will the Applicant be using verification procedures?

- Yes
- No

If yes, describe the Applicant's verification procedures.

d. OVERSIGHT OF MARKETING: Explain all methods Applicant will use to ensure all marketing is performed in an ethical manner, for both employees and subcontractors.

Currently, Star Energy Partners is only doing D2D solicitation.
See Attached 8.d.

e. OFFICERS: Identify Applicant's chief officers, and include the professional resumes for any officers directly responsible for operations.

Tony C. Banks, President and CEO
Tad Neeley, CFO and Secretary

See Attached 8.e.

f. FERC FILING: Applicant has:

- Filed an Application with the Federal Energy Regulatory Commission to be a Power Marketer.
- Received approval from FERC to be a Power Marketer at Docket or Case Number ER13-281-000
- Not applicable

See Attached 8.f.

9. DISCLOSURE STATEMENT:

Disclosure Statements: If proposing to serve Residential and/or Small Commercial (under 25 kW) Customers, provide a Residential and/or Small Commercial disclosure statement. A sample disclosure statement is provided as Appendix G to this Application. See Attached Appendix G.

- Electricity should be priced in clearly stated terms to the extent possible. Common definitions should be used. All consumer contracts or sales agreements should be written in plain language with any exclusions, exceptions, add-ons, package offers, limited time offers or other deadlines prominently communicated. Penalties and procedures for ending contracts should be clearly communicated.

Not applicable for an applicant applying for a license exclusively as a broker/marketer.

10. VERIFICATIONS, ACKNOWLEDGEMENTS, AND AGREEMENTS

a. **PJM LOAD SERVING ENTITY REQUIREMENT:** As a prospective EGS, the applicant understands that those EGSs which provide retail electric supply service (i.e. takes title to electricity) must provide either:

- proof of registration as a PJM Load Serving Entity (LSE), or
- proof of a contractual arrangement with a registered PJM LSE that facilitates the retail electricity services of the EGS. See Attached 8.a.vi.

The Applicant understands that compliance with this requirement must be filed within 120 days of the Applicant receiving a license. As well, the Applicant understands that compliance with this requirement may be filed with this instant application.

(Select only one of the following)

- AGREED** - Applicant has included compliance with this requirement in the instant application, labeled in correspondence with this section (10).
- AGREED** - Applicant will provide compliance with this requirement within 120 days of receiving its license
- ACKNOWLEDGED** - Applicant is not proposing to provide retail electric supply service at this time, and therefore is not presently obligated to provide such information

b. **STANDARDS OF CONDUCT AND DISCLOSURE:** As a condition of receiving a license, Applicant agrees to conform to any Uniform Standards of Conduct and Disclosure as set forth by the Commission. Further, the Applicant agrees that it must comply with and ensure that its employees, agents, representatives, and independent contractors comply with the standards of conduct and disclosure set out in Commission regulations at 52 Pa. Code § 54.43, as well as any future amendments.

- AGREED**

c. **REPORTING REQUIREMENTS:** Applicant agrees to provide the following information to the Commission or the Department of Revenue, as appropriate:

- Retail Electricity Choice Activity Reports: The regulations at 52 Pa. Code §§ 54.201–54.204 require that all active EGSs report sales activity information. An EGS will file an annual report reporting for customer groups defined by annual usage. Reports must be filed using the appropriate report form that may be obtained from the PUC's Secretary's Bureau or the forms officer, or may be down-loaded from the PUC's internet web site.
- Reports of Gross Receipts: Applicant shall report its Pennsylvania intrastate gross receipts to the Commission on a quarterly and year to date basis no later than 30 days following the end of the quarter.
- The Treasurer or other appropriate officer of Applicant shall transmit to the Department of Revenue by March 15, an annual report, and under oath or affirmation, of the amount of gross receipts received by Applicant during the prior calendar year.
- Net Metering Reports: Applicant shall be responsible to report any Net Metering per the Standards on http://www.puc.pa.gov/consumer_info/electricity/alternative_energy.aspx. Scroll down to the Net Metering Standards Section.
- Applicant shall report to the Commission the percentages of total electricity supplied by each fuel source on an annual basis per 52 Pa. Code § 54.39(d).
- Applicant will be required to meet periodic reporting requirements as may be issued by the Commission to fulfill the Commission's duty under Chapter 28 pertaining to reliability and to inform the Governor and Legislature of the progress of the transition to a fully competitive electric market.

AGREED

d. **TRANSFER OF LICENSE:** The Applicant understands that if it plans to transfer its license to another entity, it is required to request authority from the Commission for permission prior to transferring the license. See 66 Pa. C.S. Section 2809(D). Transferee will be required to file the appropriate licensing application.

AGREED

e. **ASSESSMENT:** The Commission does not presently assess Electric Generation Suppliers for the purposes of recovery of regulatory expenses; see *PPL Energyplus, LLC v. Commonwealth*, 800 A.2d 360 (Pa. Cmwlth. 2002).

ACKNOWLEDGED

f. **FURTHER DEVELOPMENTS:** Applicant is under a continuing obligation to amend its application if substantial changes occur to the information upon which the Commission relied in approving the original filing. See 52 Pa. Code § 54.34.

AGREED

- g. **FALSIFICATION:** The Applicant understands that the making of false statement(s) herein may be grounds for denying the Application or, if later discovered, for revoking any authority granted pursuant to the Application. This Application is subject to 18 Pa. C.S. §§4903 and 4904, relating to perjury and falsification in official matters.

AGREED

- h. **NOTIFICATION OF CHANGE:** If your answer to any of these items changes during the pendency of your application or if the information relative to any item herein changes while you are operating within the Commonwealth of Pennsylvania, you are under a duty to so inform the Commission, within twenty (20) days, as to the specifics of any changes which have a significant impact on the conduct of business in Pennsylvania. See 52 Pa. Code § 54.34.

AGREED

- i. **CEASING OF OPERATIONS:** Applicant is also required to officially notify the Commission if it plans to cease doing business in Pennsylvania, 90 days prior to ceasing operations.

AGREED

- j. **Electronic Data Interchange:** The Applicant acknowledges the Electronic Data Interchange (EDI) requirements and the relevant contacts for each EDC, as listed at Appendix J.

AGREED

- k. **FEE:** The Applicant has enclosed or paid the required initial licensing fee of \$350.00 payable to the Commonwealth of Pennsylvania.

PAYMENT ENCLOSED

11. AFFIDAVITS

- a. **APPLICATION AFFIDAVIT:** Complete and submit with your filing an officially notarized Application Affidavit stating that all the information submitted in this application is truthful and correct. An example copy of this Affidavit can be found at Appendix A.
See Attached Appendix A.
- b. **OPERATIONS AFFIDAVIT:** Provide an officially notarized affidavit stating that you will adhere to the reliability protocols of the North American Electric Reliability Council, the appropriate regional reliability council(s), and the Commission, and that you agree to comply with the operational requirements of the control area(s) within which you provide retail service. An example copy of this Affidavit can be found at Appendix B.
See Attached Appendix B.

12. NEWSPAPER PUBLICATIONS

Notice of filing of this Application must be published in newspapers of general circulation covering each county in which the applicant intends to provide service. Below is a list of newspapers which cover the publication requirements for Electric Generation Suppliers looking to do business in Pennsylvania.

The newspapers in which proof of publication is required is dependent on the service territories the applicant is proposing to serve. The chart below dictates which newspapers are necessary for each EDC. If the applicant is proposing to serve the entire Commonwealth, please file proof of publication in all seven newspapers.

Please file with the Commission the Certification of Publication, along with a photostatic copy of the notice to complete the notice requirements.

Proof of newspaper publications must be filed with the initial application. Applicants **do not** need a docket number in their publication. Docket numbers will be issued when all criteria on the item 14 checklist (see below) are satisfied.

	Erie Times-News	Harrisburg Patriot-News	Philadelphia Daily News	Pittsburg Post-Gazette	Scranton Times-Tribune	Williamsport Sun-Gazette	Johnstown Tribune-Democrat
Citizens' Electric						X	
Duquesne				X			
Met Ed		X	X		X		
PECO			X				
Penelec	X	X			X	X	X
Penn Power	X			X			
Pike					X		
PPL		X	X		X	X	
UGI					X		
Wellsboro						X	
West Penn		X		X		X	X
Entire Commonwealth	X	X	X	X	X	X	X

(Example Publications are provided at Appendices H and I)

13. SIGNATURE

Applicant: Star Energy Partners LLC
 By: [Signature]
 Title: President & CEO

14. CHECKLIST

For the applicant's convenience, please use the following checklist to ensure all relevant sections are complete. The Commission Secretary's Bureau will not accept an application unless each of the following sections are complete.

Applicant: Star Energy Partners LLC

Applicant's Use	✓	Signature	
	✓	Filing Fee	
	✓	Application Affidavit	
	✓	Operations Affidavit	
	✓	Proof of Publication	
	✓	Bond or Letter of Credit	
	✓	Tax Certification Statement	
	✓	Commonwealth Department of State Verification	
	✓	Certificate of Service	

PUC Secretary's Bureau Use

Appendices

Appendix A

Appendix A

APPLICATION AFFIDAVIT

[Commonwealth/State] of Ohio :

: ss.

County of Summit :

Tony C. Banks, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:
Star Energy Partners LLC
[He/she is the CEO & President (Office of Affiant) of _____ (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That the Applicant herein Star Energy Partners LLC has the burden of producing information and supporting documentation demonstrating its technical and financial fitness to be licensed as an electric generation supplier pursuant to 66 Pa. C.S. § 2809 (B).

That the Applicant herein Star Energy Partners LLC has answered the questions on the application correctly, truthfully, and completely and provided supporting documentation as required.

That the Applicant herein _____ acknowledges that it is under a duty to update information provided in answer to questions on this application and contained in supporting documents.

That the Applicant herein Star Energy Partners LLC acknowledges that it is under a duty to supplement information provided in answer to questions on this application and contained in supporting documents as requested by the Commission.

That the facts above set forth are true and correct to the best of his/her knowledge, information, and belief, and that he/she expects said Applicant to be able to prove the same at hearing.

[Signature]
Signature of Affiant

Sworn and subscribed before me this 31st day of October, 2014.

[Signature]
Signature of official administering oath

My commission expires 10/27/2016



Shannon M. Dieringer
Resident Summit County
Notary Public, State of Ohio
My Commission Expires: 10/27/2016

Appendix B

Appendix B

OPERATIONS AFFIDAVIT

[Commonwealth/State] of Ohio :

: ss.

County of Summit :

Tony C. Banks, Affiant, being duly [sworn/affirmed] according to law, deposes and says that:

[He/she is the CEO & President (Office of Affiant) of Star Energy Partners LLC (Name of Applicant);]

[That he/she is authorized to and does make this affidavit for said Applicant;]

That Star Energy Partners LLC, the Applicant herein, acknowledges that [Applicant] may have obligations pursuant to this Application consistent with the Public Utility Code of the Commonwealth of Pennsylvania, Title 66 of the Pennsylvania Consolidated Statutes; or with other applicable statutes or regulations including Emergency Orders which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

That Star Energy Partners LLC, the Applicant herein, asserts that [he/she/it] possesses the requisite technical, managerial, and financial fitness to render electric service within the Commonwealth of Pennsylvania and that the Applicant will abide by all applicable federal and state laws and regulations and by the decisions of the Pennsylvania Public Utility Commission.

That Star Energy Partners LLC, the Applicant herein, certifies to the Commission that it is subject to , will pay, and in the past has paid, the full amount of taxes imposed by Articles II and XI of the Act of March 4, 1971 (P.L. 6, No. 2), known as the Tax Reform Act of 1971 and any tax imposed by Chapter 28 of Title 66. The Applicant acknowledges that failure to pay such taxes or otherwise comply with the taxation requirements of Chapter 28, shall be cause for the Commission to revoke the license of the Applicant. The Applicant acknowledges that it shall report to the Commission its jurisdictional Gross Receipts and power sales for ultimate consumption, for the previous year or as otherwise required by the Commission. The Applicant also acknowledges that it is subject to 66 Pa. C.S. §506 (relating to the inspection of facilities and records).

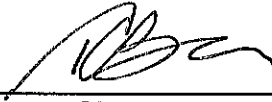
As provided by 66 Pa. C.S. §2810 (C)(6)(iv), Applicant, by filing of this application waives confidentiality with respect to its state tax information in the possession of the Department of Revenue, regardless of the source of the information, and shall consent to the Department of Revenue providing that information to the Pennsylvania Public Utility Commission.

Appendix B (Continued)

That Star Energy Partners LLC, the Applicant herein, acknowledges that it has a statutory obligation to conform with 66 Pa. C.S. §506, §2807 (C), §2807(D)(2), §2809(B) and the standards and billing practices of 52 PA. Code Chapter 56.

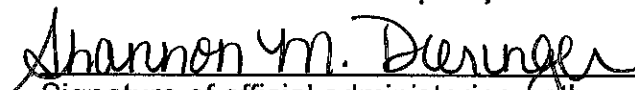
That the Applicant agrees to provide all consumer education materials and information in a timely manner as requested by the Bureau of Public Liaison or other Commission bureaus. Materials and information requested may be analyzed by the Commission to meet obligations under applicable sections of the law.

That the facts above set forth are true and correct/true and correct to the best of his/her knowledge, information, and belief.



Signature of Affiant

Sworn and subscribed before me this 8th day of October, 2014.



Signature of official administering oath

My commission expires 10/27/2016



Shannon M. Dieringer
Resident Summit County
Notary Public, State of Ohio
My Commission Expires: 10/27/2016

Appendix C

CERTIFICATE OF SERVICE

On this the 31st day of October, 2014, I certify that a true and correct copy of the foregoing application form for licensing within the Commonwealth of Pennsylvania as an Electric Generation Supplier and all attachments have been served, as either a hardcopy or a searchable PDF version on a cd-rom, upon the following:

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17120

Office of the Attorney General
Bureau of Consumer Protection
Strawberry Square, 14th Floor
Harrisburg, PA 17120

Office of the Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

Commonwealth of Pennsylvania
Department of Revenue
Bureau of Compliance
Harrisburg, PA 17128-0946

Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg, PA 15601-1689

Manager Energy Acquisition
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

Regulatory Affairs
Duquesne Light Company
411 Seventh Street, MD 16-4
Pittsburgh, PA 15219

Legal Department
Attn: Paul Russell
PPL
Two North Ninth Street
Allentown, PA 18108-1179

Legal Department
First Energy
2800 Pottsville Pike
Reading, PA 19612

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
P.O. Box 12677
Reading, PA 19612-2677

Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Boulevard
Lewisburg, PA 17837

Director of Consumer Energy Services
Orange and Rockland Company
390 West Route 59
Spring Valley, NY 10977-5300

Wellsboro Electric Company
Attn: EGS Coordination
P.O. Box 138
Wellsboro, PA 16901



Tony C. Banks, President & CEO
Star Energy Partners LLC

Appendix D

Appendix F

CONFIDENTIAL

Appendix G

Appendix G

Disclosure Statement



This is an agreement (“Agreement”) for natural gas services, between Star Energy Partners LLC (“Star Energy Partners”) and

(Customer Name and Full Address)

Background

- We at Star Energy Partners are licensed by the Pennsylvania Public Utility Commission to offer and supply electric generation services in Pennsylvania. Our PUC license number is A-XXXX-XXXXXXX.
- We set the generation prices and charges that you pay. The Public Utility Commission regulates distribution prices and services. The Federal Energy Regulatory Commission regulates transmission prices and services.
- You will receive a single bill from your EGDC that will contain the EGDC’s charges and Star Energy Partners’ charges.
- Right of Rescission – You may cancel this Agreement at any time before midnight of the third business day after receiving this Disclosure Statement. You can contact us by phone, in writing or electronically (if available) to cancel this Agreement. See Section 9 for how to contact us.

Definitions

- “Agreement” – The legal contract for Services between you and Star Energy Partners, and consists of the terms and conditions as well as any related agreement herein or therein. Notwithstanding any language to the contrary, the terms and conditions take precedence over any conflicting language in any other agreement.
- “Basic Services” – The services necessary for the physical delivery of service, including generation, transmission and distribution. The monthly customer charge and the temporary transition charge are also basic service charges.
- “Competitive Transition Charge (CTC)” – A charge applied to the bill of every customer accessing the transmission or distribution network. This charge is designed to recover an electric utility’s transition or stranded costs as determined by the Commission. For the most part, this charge will go away when rate caps expire. In some cases, it may become a credit.
- “Customer” or “you” or “your” – The person subscribing to our services and with whom we have entered into the Agreement. This includes a person we reasonably believe is acting with the authority or knowledge of the person whose name is on the account.

- “Customer Charge” – The basic service charge to partially cover costs for billing, meter reading, equipment and service line maintenance. If you select a new supplier, the name, address and telephone number for both your distribution and supplier company will appear on your bill.
- “Distribution Charges” – Part of the basic service charges on every customer’s bill for delivering electricity from the electric distribution company to your home or business. The distribution charge is regulated by the Public Utility Commission. This charge will vary according to how much electricity you use.
- “Electric Distribution Company” or “EDC” – The public utility that provides facilities for the transmission and distribution of electricity to retail customers. Electric distribution companies are regulated by the PUC. Exceptions include building or facility owners or operators that manage their internal distribution system and supply electric power and electric services to occupants of the building or facility.
- “Electric Generation Supplier” or “EGS” – A person or corporation, broker, marketer, aggregator or any other entity licensed by the PUC that sells electricity to customers, using the transmission or distribution facilities of an EDC.
- “Fixed Rate” – An all-inclusive per kWh price that will remain the same for at least three billing cycles or the term of the Agreement, whichever is longer.
- “Flat Rate” – A fixed charge for goods and services that does not vary with changes in the amount used, volume consumed, or units purchased.
- “Generation Charge” or “Generation Charges” – Part of the basic service charges on every customer’s bill for producing electricity. Generation service is competitively priced and is not regulated by the Public Utility Commission. This charge depends on the Agreement between the Customer and Supplier.
- “Hardship Funds” - Provides cash assistance to utility customers to help them pay their utility bills. Hardship funds provide assistance grants to customers who cannot qualify for other financial assistance programs, or to those who still have a critical need for assistance when there are no other resources. The funds make payments directly to companies on behalf of eligible customers. Contact your electric utility for more information. Provides cash assistance to utility customers to help them pay their utility bills. Hardship funds provide assistance grants to customers who cannot qualify for other financial assistance programs, or to those who still have a critical need for assistance when there are no other resources. The funds make payments directly to companies on behalf of eligible customers. Contact your electric utility for more information.
- “Intangible Transition Charge” – Charges to utility customers to pay for special bonds that are used to refinance utility debt, thereby lowering overall costs for the utility and its customers.
- “Kilowatt-hour” or “kWh” – The basic unit of electric energy for which most customers are charged in cents per kWh. A kWh is the equivalent of using ten 100-watt light bulbs for one hour.
- “Nonbasic Services” – Optional recurring services which are distinctly separate and clearly not required for the physical delivery of electric service.
- “Parties” – Star Energy Partners and you.
- “Renewable Energy” – Resources used to generate electricity that are replaced naturally, or by mankind’s contribution (municipal solid waste incineration and landfill methane). Renewable Energy may include fuels and technologies such as solar photovoltaic energy, solar thermal energy, wind power, low head hydropower, geothermal energy, landfill and mine based methane gas, energy from waste and sustainable biomass energy.
- “RTO” – Regional Transmission Organization.
- “Supplier” or “we” or “us” – Star Energy Partners.
- “Transmission Charge” – Part of the basic service charges on every customer’s bill for transporting electricity from the source of supply to the electric distribution company. The

Federal Energy Regulatory Commission regulates retail transmission prices and services. This charge will vary with your source of supply.

- “Variable Price” – An all-inclusive per kWh price that can change by the hours, day, months, etc. according to the terms and conditions in this Disclosure Statement.

Terms of Service

1. (a) Basic Service Prices – (Itemized list of Basic Services)

FIXED PRICE:

You will pay a fixed price of _____ per kWh for electric generation service
(Rate)

(Explain what is included in this price. EGS’s basic service price should include everything that is included in the EDC’s Price-to-Compare. Suggested language: “This price includes Transmission Charges (if applicable) and estimated Total State Taxes, including the Gross Receipts Tax, but excludes applicable state and local Sales Tax”).

VARIABLE PRICE:

You will pay a variable price that can change monthly. The price for the first billing period will be _____
(Rate)

(Explain what is included in this price. The EGS’s basic service price should include everything that is included in the EDC’s Price-to-Compare. Suggested language: “This price includes Transmission Charges (if applicable) and estimated Total State Taxes, including the Gross Receipts Tax, but excludes applicable state and local Sales Tax”).

The variable rate may vary from month to month based on monthly changes in Star Energy Partners’ costs to acquire electricity, capacity, transmission, ancillaries or other costs as is customary in the open markets for power.

More information about this variable price product, including what this price has been for the past 24 months, can be found at (www.starenergypartners.com) or you can call 1-855-427-7827. However, please remember that past prices do not indicate present or future prices.

(b) Nonbasic Service Prices – (Itemize Nonbasic Services we are offering).

2. Length of Agreement

Fixed Term Agreement – You will buy your electricity generation service for the above address from us beginning on the date set by your EDC and will continue for _____ months (or billing cycles).

Month-to-Month Agreement – You will buy your electricity generation service for the above street address from us beginning on the date set by your EDC and will continue on a month-to-month basis.

3. Special Terms and Conditions *(List all that apply).*

Examples: Sign-up bonuses; add-ons; limited time offers; other sales promotions; exclusions.

N/A

4. Special Services *(Provide explanation of price, terms and conditions, including metering deployment, if applicable).*

N/A

5. Penalties, Fees and Exceptions

Cancellation/Early Termination Fees. You may cancel until midnight of the third business day without incurring penalties or early termination fees following the postmark date of the Disclosure Statement, otherwise known as the rescission period. If this Agreement is not rescinded during any applicable rescission period, then your enrollment will be complete. Thereafter, you may terminate this Agreement, without penalty, if you move from the address detailed in this Agreement or if there is a change in law or regulation that physically prevents or legally prohibits us from performing under this Agreement. If you terminate this Agreement for any other reason, such termination requires 30 days prior written notice and you may be subject to an early termination fee ("ETF"). Refer to your Agreement for your ETF amount. Variable Rate Customers will not be charged an ETF upon termination of this Agreement.

We may also terminate this Agreement upon 30 days written notice, without penalty to you or us, if such termination by us is due to a change in law or other act beyond our reasonable control that would cause us to no longer be able to provide Service to you. Upon any termination of the Agreement, unless you have selected another EGS, you will return to receiving standard service offered from your EDC, in which case you may not be served under the same rates, terms, and conditions that apply to other EDC customers.

Any termination notice sent by you or us must specify the termination date subject to the applied notice period set forth herein. Upon any termination, other than as stated herein, you will remain responsible for any unpaid balance as of the termination date, plus any applicable ETF. The delivery of electricity to you cannot be terminated or interrupted by the EDC as a result of any dispute between us and you, but may be terminated by the EDC for nonpayment of EDC charges in accordance with applicable law. Since the EDC purchases our receivables attributable to the Services provided to you hereunder, such receivables become EDC charges for purpose of termination of Service.

Billing and Payment. You will receive a single bill for the Service supplied by us and the electric distribution from the EDC at the monthly interval set with the EDC. While we do not offer budget billing, if you have chosen Budget Billing and are receiving a single bill for both Service and the delivery of such Service from EDC, EDC will continue to manage your Budget Billing and determine your monthly payment for Service. Please contact EDC with any questions regarding your budget. You will be billed additional charges, including taxes and charges to transmit and distribute the electricity to your home from the EDC, consistent with its filed tariffs. You are responsible for paying any new or increased taxes imposed on us or you regarding

transmission or distribution of the electricity during the term of this Agreement. Bills not paid in full by the due date will incur a late payment fee on unpaid balances in accordance with the EDC's billing and late payment policies and procedures. In addition, you agree to pay us our costs incurred in collecting amounts owed us, including reasonable attorney fees and returned check charges. Supplier reserves the right to change billing methods.

If you receive a separate bill from Supplier for your Service and you fail to pay your bill on time, you will be subject to a late payment fee in the amount of 1.5% per month, and to collection costs incurred due to your late payment or non-payment. All returned checks will be subject to the maximum fee allowed by law. In addition, you agree to pay Supplier's costs in collecting amounts owed, including reasonable attorney's fees. Supplier reserves the right to cancel this Agreement after giving you a minimum of 14 days written notice should you fail to pay your bill by the due date.

Credit and Deposits. If required by Supplier, you authorize us to ask commercial reporting agencies to furnish us with credit information. If you believe that we have reported inaccurate information about your account to a consumer-reporting agency, you may send us a written notice describing the specific inaccuracy.

We may require that you make an initial deposit before we establish or maintain Service for you. The deposit will be held as a partial guarantee of payment and cannot be used by you to pay your bill or delay payment. Unless otherwise required by law, deposits may be mixed with other funds and will not earn interest. We may require you to increase your deposit at any time and from time to time to reflect your estimated monthly Generation Charges and we will base that increase on your actual use of the Service or on our reevaluation of your ability to pay. You may ask us to reevaluate your deposit on an annual basis, which may result in a partial or total refund of the deposit to you or a credit to your account, at Supplier's discretion. If you default or the Agreement is terminated, we may, without notice to you, apply any deposit toward payment of Generation Charges due. Your unused deposit will be returned in accordance with applicable law.

8. Agreement Expiration/Change in Terms

If you have a fixed term ("Term") agreement with us that is longer than 3 months and it is approaching the expiration date, we will send you advance written notices at about 90 days and 60 days before the expiration date. If we propose to change our terms of service in any type of agreement, we will send you advance written notices at about 90 days and 60 days before the effective date of the change. If we are billing you directly for our services, then we will provide the notices as a bill message, a bill insert, or in a separate corresponding mailing. If the EDC is billing our charges for us, then we will provide the notices in separate corresponding mailings. We will explain your options to you in these two advance notifications.

At the end of the Term, this Agreement will renew on a month-to-month basis under the same terms and conditions or different terms and conditions and at company's then current variable rate, regardless of your affirmative consent. If you wish to enter into a new fixed term agreement, you will need to notify us as detailed in our Notices to you. If you continue on a month-to-month basis or enter into a new fixed term agreement, you will be able to cancel at any time without an ETF upon 30 days written notice. You

are responsible for arranging your Retail Electric Generation Service upon the termination of this Agreement.

9. Dispute Procedures

Contact us with any questions concerning our terms of service at the contact information below. If you are still not satisfied after discussing the terms within this Disclosure Statement, you may call the PUC at the contact information below.

10. Contact Information

Supplier:

Name: Star Energy Partners LLC
 Address: 3340 W. Market Street, Suite 100
 Akron, OH 44333
 Phone Number: 1-855-427-7827
 Internet Address: www.starenergypartners.com

Electric Distribution Company/Default Service Provider:

Name:
 Address:
 Phone Number:

Universal Service – Customer Assistance Program:

Phone Number:

Public Utility Commission (PUC):

www.puc.pa.gov
 Address: P.O. Box 3265 Harrisburg, PA 17105-3265
 Phone Number: 1-800-692-7380

<p>Electric Generation Supplier Information</p>	<p>Star Energy Partners 3340 W. Market Street, Suite 100 Akron, OH 44333 1-855-427-7827 www.starenergypartners.com</p> <p>Star Energy Partners is responsible for the generation charges.</p>
<p>Price Structure</p>	<p>Fixed and Variable.</p> <p>Variable rates are based on the monthly changes in Star Energy Partners' costs to acquire electricity, capacity, transmission, ancillaries or other costs as is customary in the open markets for power.</p>

Generation/Supply Price	Fixed: _____ per kWh. Variable: _____ per kWh for the first billing cycle. Term:
Savings	The supply price may not always provide savings to the customer.
Deposit Requirements	TBD
Incentives	None.
Contract Start Date	TBD
Contract Term Length	Month Term
Cancellation/Early Termination Fees	Yes.
Renewal Terms	At the end of the Term, this Agreement will renew on a month-to-month basis under the same terms and conditions or different terms and conditions and at company's then current variable rate, regardless of your affirmative consent. If you wish to enter into a new fixed term agreement, you will need to notify us as detailed in our Notices to you. If you continue on a month-to-month basis or enter into a new fixed term agreement, you will be able to cancel at any time without an ETF upon 30 days written notice. You are responsible for arranging your Retail Electric Generation Service upon the termination of this Agreement.
Electric Distribution Company Information	TBD

SAMPLE

Appendix I

Appendix I

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE**

*Applications of **Star Energy Partners LLC** For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, or Marketer/Broker Engaged In The Business of Supplying Natural Gas Supply Services and Electric Supply or Electric Generation Services, To The Public In The Commonwealth of Pennsylvania.*

Star Energy Partners LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. **Star Energy Partners LLC** will also be filing an application with the PUC for a license to supply electricity or electric generation services as (1) a generation and supplier of electric power, (2) a broker/marketer engaged in the business of supplying electricity, and (3) an aggregator engaged in the business of supplying electricity. **Star Energy Partners LLC** proposes to sell electricity, natural gas, and related services throughout all of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Star Energy Partners LLC** may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3265, Harrisburg, PA 17105-3265. You should send copies of any protest to **Star Energy Partners LLC's** attorney at the address listed below.

By and through Counsel: Sandi Murphy
Star Energy Partners LLC
3340 W. Market Street, Suite 100
Akron, OH 44333
1-855-427-7827


Proof of Publication in The Philadelphia Daily News
Under Act. No 587, Approved May 16, 1929

STATE OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Florence Devlin being duly sworn, deposes and says that **The Philadelphia Daily News** is a newspaper published daily, except Sunday, at Philadelphia, Pennsylvania, and was established in said city in 1925, since which date said newspaper has been regularly issued in said County, and that a copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions and issues of the said newspaper on the following dates:

October 20, 2014

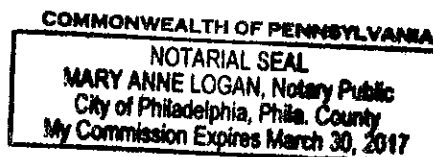
Affiant further deposes and says that she is an employee of the publisher of said newspaper and has been authorized to verify the foregoing statement and that she is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.



Sworn to and subscribed before me this 20th day of
October, 2014.


Notary Public

My Commission Expires:



Copy of Notice of Publication

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE

Applications of **Star Energy Partners LLC** For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, or Marketer/Broker Engaged In The Business of Supplying Natural Gas Supply Services and Electric Supply or Electric Generation Services, To The Public In The Commonwealth of Pennsylvania. **Star Energy Partners LLC** will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/ marketer engaged in the business of providing natural gas services. **Star Energy Partners LLC** will also be filing an application with the PUC for a license to supply electricity or electric generation services as (1) a generation and supplier of electric power, (2) a broker/marketer engaged in the business of supplying electricity, and (3) an aggregator engaged in the business of supplying electricity. **Star Energy Partners LLC** proposes to sell electricity, natural gas, and related services throughout all of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act. The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of **Star Energy Partners LLC** may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3266, Harrisburg, PA 17106-3266. You should send copies of any protest to **Star Energy Partners LLC's** attorney at the address listed below. By and through Counsel: Sandi Murphy
Star Energy Partners LLC
3340 W. Market Street, Suite 100
Akron, OH 44333
1-855-427-7827

The Scranton Times (Under act P.L. 877 No 160. July 9, 1976)
Commonwealth of Pennsylvania, County of Lackawanna

STAR ENERGY PARTNERS
CHAD YODER
3340 WEST MARKET STREET AKRON OH 44333

Account # 602213
Order # 81624935
Ad Price: 260.80

LEGAL NOTICE PENNSYLVANIA

Gina Krushinski

Being duly sworn according to law deposes and says that (s)he is Billing clerk for The Scranton Times, owner and publisher of The Scranton Times, a newspaper of general circulation, established in 1870, published in the city of Scranton, county and state aforesaid, and that the printed notice or publication hereto attached is exactly as printed in the regular editions of the said newspaper on the following dates:

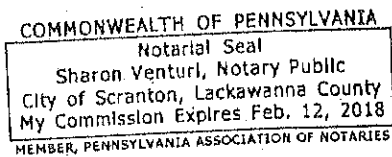
10/18/2014

Affiant further deposes and says that neither the affiant nor The Scranton Times is interested in the subject matter of the aforesaid notice or advertisement and that all allegations in the foregoing statement as time, place and character or publication are true Gina Krushinski

Sworn and subscribed to before me
this 20th day of October A.D., 2014

Sharon Venturi

(Notary Public)



LEGAL NOTICE

PENNSYLVANIA PUBLIC UTILITY
COMMISSION NOTICE

Applications of **Star Energy Partners LLC** For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, or Marketer/Broker Engaged in The Business of Supplying Natural Gas Supply Services and Electric Supply or Electric Generation Services, To The Public In The Commonwealth of Pennsylvania.

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By and through Counsel:
Sandi Murphy

Star Energy Partners LLC
3340 W. Market Street, Suite 100
Akron, OH 44333
1-855-427-7827

COMMONWEALTH OF PENNSYLVANIA }
 County of Cambria } SS

PENNSYLVANIA PUBLIC UTILITY COMMISSION
 NOTICE

Applications of **Star Energy Partners LLC** For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, or Marketer/Broker Engaged In The Business of Supplying Natural Gas Supply Services and Electric Supply or Electric Generation Services, To The Public In The Commonwealth of Pennsylvania.

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By and through Counsel: Sandi Murphy
Star Energy Partners LLC
 3340 W. Market Street, Suite 100
 Akron, OH 44333
 1-855-427-7827

On this 21st day of October A.D. 2014, before me, the subscriber, a Notary Public in and for said County and State, personally appeared **Christine Marhefka**, who being duly sworn according to law, deposes and says as Classified Advertising Manager of the *Tribune-Democrat*, Johnstown, PA, a newspaper of general circulation as defined by the "Newspaper Advertising Act", a merger September 8, 1952, of the *Johnstown Tribune*, established December 7, 1853; and of the *Johnstown Democrat*, established March 5, 1863,

County of Cambria, and Commonwealth of Pennsylvania and the matter published in said publication in the regular issues of *The Tribune-Democrat*, on October 18, 2014; and that the Affiant is not advertising and that all of the allegations as to time, place and

Christine Marhefka

STATEMENT OF ADVERTISING COSTS

Sworn and Subscribed before me this 21st day of October, 2014.

Juan Ohs

0.00 Lines @ \$2.50 per line	0.00
7.5 Inches @ \$25.00 per inch	187.50
Notary Fee	5.00
Clerical Fee	2.50
Total Cost	195.00

COMMONWEALTH OF PENNSYLVANIA
 Notarial Seal
 Vivian Ohs, Notary Public
 City of Johnstown, Cambria County
 My Commission Expires Dec. 6, 2016
 MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

To The *Tribune-Democrat*, Johnstown, PA
 For publishing the notice or publication attached hereto on the above stated dates.

PUBLISHER'S RECEIPT FOR ADVERTISING COSTS

_____ for publisher of _____
 a newspaper of general circulation, hereby acknowledges receipt of the aforesaid and publication costs and certifies that the same has been duly paid.

 (Name of Newspaper)

By _____

PROOF OF PUBLICATION OF NOTICE IN THE WILLIAMSPORT SUN-GAZETTE UNDER ACT NO. 587, APPROVED MAY 16, 1929

STATE OF PENNSYLVANIA
COUNTY OF LYCOMING

SS:

Bernard A. Oravec

Publisher of the Sun-Gazette Company, publishers of the Williamsport, Sun-Gazette, successor to the Williamsport Sun and the Gazette & Bulletin, both daily newspapers of general circulation, published at 252 West Fourth Street, Williamsport, Pennsylvania, being duly sworn, deposes and says that the Williamsport Sun was established in 1870 and the Gazette & Bulletin was established in 1801, since which dates said successor, the Williamsport Sun-Gazette, has been regularly issued and published in the County of Lycoming aforesaid, and that a copy of the printed notice is attached hereto exactly as the same was printed and published in the regular editions of said Williamsport Sun-Gazette on the following dates, viz:

October 20, 2014

PENNSYLVANIA
PUBLIC UTILITY
COMMISSION
NOTICE

Affiant furnished to verify the of publication

Applications of Star Energy Partners LLC For Approval To Offer, Render, or Furnish Services as a Supplier, Aggregator, or Marketer/ Broker Engaged In The Business of Supplying Natural Gas Supply Services and Electric Supply or Electric Generation Services, To The Public In The Commonwealth of Pennsylvania.

Star Energy Partners LLC will be filing an application with the Pennsylvania Public Utility Commission ("PUC") for a license to provide natural gas supply services as (1) a supplier or aggregator of natural gas, and (2) a broker/marketer engaged in the business of providing natural gas services. Star Energy Partners LLC will also be filing an application with the PUC for a license to supply electricity or electric generation services as (1) a generation and supplier of electric power, (2) a broker/marketer engaged in the business of supplying electricity, and (3) an aggregator engaged in the business of supplying electricity. Star Energy Partners LLC proposes to sell electricity, natural gas, and related services throughout all of Pennsylvania under the provisions of the new Natural Gas Choice and Competition Act and the Electricity Generation Customer Choice and Competition Act.

THE SUN-GAZETTE and certifies that

The PUC may consider this application without a hearing. Protests directed to the technical or financial fitness of Star Energy Partners LLC may be filed within 15 days of the date of this notice with the Secretary of the PUC, P.O. Box 3285, Harrisburg, PA 17105-3285. You should send copies of any protest to Star Energy Partners LLC's attorney at the address listed below.

An officer daily authorized by the Sun-Gazette Company, publisher of the Williamsport Sun-Gazette, under oath and also declares that affiant is not interested in the subject matter of the aforesaid notice and that the facts stated in the foregoing statement as to time, place and character of publication are true.

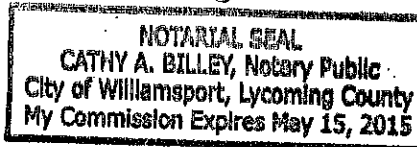
Bernard A. Oravec

SUN-GAZETTE COMPANY

Sworn to and subscribed before me

the *21st* day of *October* 20*14*

Cathy A. Billey
Notary Public



STATEMENT OF ADVERTISING COSTS

To the Sun-Gazette Company, Dr.:	
For publishing the notice attached hereto on the above state dates.....	\$ <i>324.12</i>
Probated same.....	\$
Total.....	\$ <i>324.12</i>

DEBITOR'S RECEIPT FOR ADVERTISING COSTS

whereby acknowledges receipt of the aforesaid advertising and publication costs in fully paid.

SUN-GAZETTE COMPANY

BY Bernard A. Oravec

PROOF OF PUBLICATION
In
THE ERIE TIMES-NEWS
COMBINATION EDITION

Star Energy Partners
3340 West Market Street
Akron OH 44333

REFERENCE: 82822 100524
PUC Notice

STATE OF PENNSYLVANIA)
COUNTY OF ERIE) SS:

Debra McGraw, being duly sworn, deposes and says that: (1) he/she is a designated agent of the Times Publishing Company (TPC) to execute Proofs of Publication on behalf of the TPC; (2) the TPC, whose principal place of business is at 205 W. 12th Street, Erie, Pennsylvania, owns and publishes the Erie Times-News, established October 2, 2000, a daily newspaper of general circulation, and published at Erie, Erie County Pennsylvania; (3) the subject notice or advertisement, a true and correct copy of which is attached, was published in the regular edition(s) of said newspaper on the date(s) referred to below. Affiant further deposes that he/she is duly authorized by the TPC, owner and publisher of the Erie Times-News, to verify the foregoing statement under oath, and affiant is not interested in the subject matter of the aforesaid notice or advertisement, and that all allegations in the foregoing statement as to time, place and character of publication are true.

PUBLISHED ON: 10/21/14

TOTAL COST: \$409.00 AD SPACE: 0 Lines

FILED ON: 10/21/14

PENNSYLVANIA PUBLIC UTILITY COMMISSION
NOTICE

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By and through Counsel: Sandi Murphy
Star Energy Partners LLC
3340 W. Market Street, Suite 100
Akron, OH 44333
1-855-427-7827

adnoe-100524

Sworn to and subscribed before me this 21st day of October 2014

Affiant: Debra McGraw

NOTARY: Barbara J. Moore

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Barbara J. Moore, Notary Public
City of Erie, Erie County
My Commission Expires March 23, 2016
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

The Patriot-News Co.
2020 Technology Pkwy
Suite 300
Mechanicsburg, PA 17050
Inquiries - 717-255-8213

The Patriot-News
Now you know

STAR ENERGY PARTNERS
3340 WEST MARKET STREET

AKRON

OH 44333

THE PATRIOT NEWS
THE SUNDAY PATRIOT NEWS

Proof of Publication

Under Act No. 587, Approved May 16, 1929
Commonwealth of Pennsylvania, County of Dauphin} ss

Marianne Miller, being duly sworn according to law, deposes and says:

That she is the Assistant Controller of The Patriot News Co., a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal office and place of business at 2020 Technology Pkwy, Suite 300, in the Township of Hampden, County of Cumberland, State of Pennsylvania, owner and publisher of The Patriot-News and The Sunday Patriot-News newspapers of general circulation, printed and published at 1900 Patriot Drive, in the City, County and State aforesaid; that The Patriot-News and The Sunday Patriot-News were established March 4th, 1854, and September 18th, 1949, respectively, and all have been continuously published ever since;

That the printed notice or publication which is securely attached hereto is exactly as printed and published in their regular weekly editions which appeared on the date(s) indicated below. That neither she nor said subject matter of said printed notice or advertising, and that all of the allegations of this statement as to the character of publication are true; and that she has personal knowledge of the facts aforesaid and is duly authorized and empowered to verify this statement on behalf of The Patriot News Co. aforesaid by virtue and pursuant to a resolution unanimously passed and adopted severally by the directors of the said Company and subsequently duly recorded in the office for the Recording of Deeds in Dauphin in Miscellaneous Book "M", Volume 14, Page 317.

Miscellaneous Notices

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
NOTICE**

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By and through Counsel:
Sandi Murphy
Star Energy Partners LLC
3340 W. Market Street, Suite 100
Akron, OH 44333
1-855-427-7827

This ad # 0002317662 ran on the dates shown below:

October 21, 2014

Sworn to and subscribed before me this 22 day of October, 2014 A.D.

Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

Sheryl Marie Leggore, Notary Public
Hampden Twp., Cumberland County
My Commission Expires July 16, 2018

MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES


Proof of Publication of Notice in Pittsburgh Post-Gazette

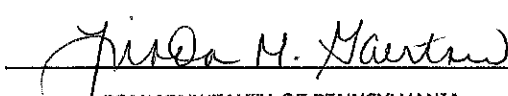
Under Act No 587, Approved May 16, 1929, PL 1784, as last amended by Act No 409 of September 29, 1951

Commonwealth of Pennsylvania, County of Allegheny, ss K. Flaherty, being duly sworn, deposes and says that the Pittsburgh Post-Gazette, a newspaper of general circulation published in the City of Pittsburgh, County and Commonwealth aforesaid, was established in 1993 by the merging of the Pittsburgh Post-Gazette and Sun-Telegraph and The Pittsburgh Press and the Pittsburgh Post-Gazette and Sun-Telegraph was established in 1960 and the Pittsburgh Post-Gazette was established in 1927 by the merging of the Pittsburgh Gazette established in 1786 and the Pittsburgh Post, established in 1842, since which date the said Pittsburgh Post-Gazette has been regularly issued in said County and that a copy of said printed notice or publication is attached hereto exactly as the same was printed and published in the _____ regular _____ editions and issues of the said Pittsburgh Post-Gazette a newspaper of general circulation on the following dates, viz:

20 of October, 2014

Affiant further deposes that he/she is an agent for the PG Publishing Company, a corporation and publisher of the Pittsburgh Post-Gazette, that, as such agent, affiant is duly authorized to verify the foregoing statement under oath, that affiant is not interested in the subject matter of the afore said notice or publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.


PG Publishing Company
Sworn to and subscribed before me this day of:
October 20, 2014


COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Linda M. Gaertner, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Jan. 31, 2015
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

STATEMENT OF ADVERTISING COSTS

Star Energy Partners
3340 West Market Street
Akron OH 44333

To PG Publishing Company

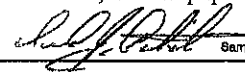
Total ----- \$540.00

Publisher's Receipt for Advertising Costs

PG PUBLISHING COMPANY, publisher of the Pittsburgh Post-Gazette, a newspaper of general circulation, hereby acknowledges receipt of the aforesaid advertising and publication costs and certifies that the same have been fully paid.

Office
34 Boulevard of the Allies
PITTSBURGH, PA 15222
Phone 412-263-1338

PG Publishing Company, a Corporation, Publisher of
Pittsburgh Post-Gazette, a Newspaper of General Circulation

By  Samuel J. Arbutina

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

COPY OF NOTICE OR PUBLICATION

PENNSYLVANIA PUBLIC UTILITY COMMISSION NOTICE

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By and through Counsel: Sandi Murphy, Star Energy Partners LLC, 3340 W. Market Street, Suite 100, Akron, OH 44333, 1-855-427-7827.

Schedules

Schedule 2.b.i.

PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU

Application for Registration - Foreign

(15 Pa.C.S.)

- Registered Limited Liability General Partnership (§ 8211)
 Registered Limited Liability Limited Partnership (§ 8211)
 Limited Partnership (§ 8582)
 Limited Liability Company (§ 8981)

Name Mary Cegelski		
Address 3340 West Market Street		
City Akron, OH	State OH	Zip Code 44333

Document will be returned to the
name and address you enter to
the left.



Commonwealth of Pennsylvania
APPLICATION FOR REGISTRATION 3 Page(s)



T1225164041

Fee: \$250

In compliance with the requirements of the applicable provisions (relating to registration), the undersigned, desiring to register to do business in this Commonwealth, hereby states that:

1. The name of the limited liability company/limited liability partnership/limited partnership in the jurisdiction in which it is formed:

Star Energy Partners LLC

2. The name under which the limited liability company/limited liability partnership/limited partnership proposes to register and do business in this Commonwealth is:

Star Energy Partners LLC

3. The name of the jurisdiction under the laws of which it was organized and the date of its formation:

Jurisdiction: Delaware Date of Formation: 8/6/2012

4. The (a) address of its initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and street City State Zip County

(b) Name of Commercial Registered Office Provider County
National Corporate Research, Ltd Dauphin

2012 SEP -6 PM 3:06

PA DEPT OF STATE

5. Check and complete one of the following:

The address of the office required to be maintained by it in the jurisdiction of its organization by the laws of that jurisdiction is:

Number and street	City	State	Zip
-------------------	------	-------	-----

It is not required by the laws of its jurisdiction of organization to maintain an office therein and the address of its principal office is:

3340 West Market Street	Akron	OH	44333
Number and street	City	State	Zip

6. ~~For Restricted Professional/Limited Liability Company Only. Strike but if applicable: The company is a restricted professional company organized to render the following professional service(s).~~

Limited Liability Partnership and Limited Partnership: Complete paragraphs 7 and 8

7. The name and business address of each general partner.

Name	Business Address
n/a	

8. The address of the office at which is kept a list of the names and addresses of the limited partners and their capital contribution is:

n/a

Number and street	City	State	Zip	County
-------------------	------	-------	-----	--------

The registered partnership hereby undertakes to keep those records until its registration to do business in the Commonwealth is canceled or withdrawn.

IN TESTIMONY WHEREOF, the undersigned has caused this Application for Registration to be signed by a duly authorized officer/member or manager thereof this

20th day of August, 2012.

Star Energy Partners LLC

Name of Partnership/Company

Sande Munday

Signature

Secretary

Title

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
CORPORATION BUREAU
401 NORTH STREET, ROOM 206
P.O. BOX 8722
HARRISBURG, PA 17105-8722
WWW.CORPORATIONS.STATE.PA.US/CORP

Star Energy Partners LLC

THE CORPORATION BUREAU IS HAPPY TO SEND YOU YOUR FILED DOCUMENT. THE CORPORATION BUREAU IS HERE TO SERVE YOU AND WANTS TO THANK YOU FOR DOING BUSINESS IN PENNSYLVANIA.

IF YOU HAVE ANY QUESTIONS PERTAINING TO THE CORPORATION BUREAU, PLEASE VISIT OUR WEB SITE LOCATED AT WWW.CORPORATIONS.STATE.PA.US/CORP OR PLEASE CALL OUR MAIN INFORMATION TELEPHONE NUMBER (717)787-1057. FOR ADDITIONAL INFORMATION REGARDING BUSINESS AND / OR UCC FILINGS, PLEASE VISIT OUR ONLINE "SEARCHABLE DATABASE" LOCATED ON OUR WEB SITE.

ENTITY NUMBER: 4132488

Cegelski, Mary
3340 West Market Street
Akron, OH 44333

Delaware

PAGE 1

The First State


I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "STAR ENERGY PARTNERS LLC", FILED IN THIS OFFICE ON THE SIXTH DAY OF AUGUST, A.D. 2012, AT 10:48 O'CLOCK A.M.



5190630 8100

120907099

You may verify this certificate online
at corp.delaware.gov/authver.shtml


Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 9759416

DATE: 08-06-12

STATE of DELAWARE
LIMITED LIABILITY COMPANY
CERTIFICATE of FORMATION

First: The name of the limited liability company is Star Energy Partners LLC

Second: The address of its registered office in the State of Delaware is 615 South DuPont Highway in the City of Dover
Zip code 19901. The name of its Registered agent at such address is National Corporate Research, Ltd

Third: (Use this paragraph only if the company is to have a specific effective date of dissolution: "The latest date on which the limited liability company is to dissolve is _____.")

Fourth: (Insert any other matters the members determine to include herein.)

In Witness Whereof, the undersigned have executed this Certificate of Formation this

6th day of August, 2012.

By: Sandi Murphy
Authorized Person(s)

Name: Sandi Murphy



State of Delaware

SECRETARY OF STATE
DIVISION OF CORPORATIONS
P.O. BOX 898
DOVER, DELAWARE 19903

120907099

9909284
STAR ENERGY PARTNERS LLC
3340 WEST MARKET STREET
AKRON

OH 44333

08-06-2012

ATTN: MARY CEGELSKI X

DESCRIPTION	AMOUNT
STAR ENERGY PARTNERS LLC	
5190630 0102Y Register L.L.C.	
Certification Fee	50.00
Formation Fee	70.00
Court Municipality Fee, Dover	20.00
Expedite Fee, Same Day	100.00
FILING TOTAL	240.00
TOTAL PAYMENTS	240.00
SERVICE REQUEST BALANCE	.00

Schedule 2.b.ii.

Schedule 2.b.ii.

List of Officers

Tony Banks, President & CEO
3340 W. Market Street
Akron, OH 44333

Tad Neeley, CFO & Secretary
162 Hillside Avenue
Mill Valley, CA 94941

Schedule 5.c.

Schedule 5.c.

Customer/Regulatory/Prosecutory Actions

Star Energy Partners has received a total of 38 PUCO Complaints; 10 BBB Complaints; and 2 Attorney General Complaints in the past 2 years. All Complaints are answered within the required time allotted and all have been resolved to the satisfaction of the agency and customer.

Schedule 7.b.i.

CONFIDENTIAL

Schedule 7.b.iii.

CONFIDENTIAL

Schedule 7.b.iv.



CERTIFICATE OF LIABILITY INSURANCE

STARE-1

OP ID: JL

DATE (MM/DD/YYYY)

04/23/13

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER SeibertKeck Insurance Agency 2950 W. Market Street Akron, OH 44333-3600 Craig A. Hassinger	330-867-3140	CONTACT NAME: Jill Lucey
	330-865-6826	PHONE (A/C, No., Ext): 330-867-3140 FAX (A/C, No): 330-865-6826
		E-MAIL ADDRESS: jlucey@seibertkeck.com
		INSURER(S) AFFORDING COVERAGE
		INSURER A: Cincinnati Insurance Co. NAIC # 10677
		INSURER B:
		INSURER C:
		INSURER D:
		INSURER E:
		INSURER F:

INSURED
Star Energy Partners LLC
3340 West Market Street
Akron, OH 44333

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL SUBR INSR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input checked="" type="checkbox"/> PROJECT <input type="checkbox"/> LOC		ENP 0181649	02/21/13	02/21/14	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 500,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000
A	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS		ENP 0181649	02/21/13	02/21/14	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input checked="" type="checkbox"/> RETENTION \$ 0		ENP 0181649	02/21/13	02/21/14	EACH OCCURRENCE \$ 3,000,000 AGGREGATE \$ 3,000,000
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	N/A	ENP 0181649 EMPLOYERS LIABILITY	02/21/13	02/21/14	WC STATUTORY LIMITS <input checked="" type="checkbox"/> OTHER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

CERTIFICATE HOLDER

PENNS20

Pennsylvania Public Utility
Commission
PO Box 3265
Harrisburg, PA 17105-3265

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Schedule 7.c.

CONFIDENTIAL

Schedule 8.a.i.

CONFIDENTIAL

Schedule 8.a.ii.

Schedule 8.a.ii.

Summary of Licenses in other states or jurisdictions

Star Energy Partners is currently only licensed in Ohio as a Competitive Electric and Natural Gas Supplier. We did submit an application for both Electric Power and Gas Supplier with the New Jersey Board of Public Utilities on September 26, 2014 and have not received any communication or certificates of this date.


**Public Utilities
Commission**

John Kasich, Governor
Todd A. Snitchler, Chairman

Commissioners

Cheryl Roberto
Steven D. Lesser
Andre T. Porter
Lynn Slaby

PUBLIC UTILITIES COMMISSION OF OHIO

Certified as a Competitive Retail Electric Service Provider

Certificate Number:

12-613E (1)

Issued Pursuant to Case Number(s):

12-2983-EL-CRS

A certificate as a Competitive Retail Electric Service Provider is hereby granted to, **Star Energy Partners, LLC** whose office or principal place of business is located at **3340 West Market Street, Akron, Ohio 44333** to provide **retail generation, aggregation, and power marketer services** within the State of Ohio **effective December 15, 2012.**

The certification of competitive retail electric suppliers is governed by Section 4901:1-24-(01-13) of the Ohio Administrative Code, Section 4901:1-21-(01-15) of the Ohio Administrative Code, and Section 4928.08 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) are not met.

Subject to all rules and regulations of the Commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio.

Dated: **12/17/2012**

By Order of

PUBLIC UTILITIES COMMISSION OF OHIO

Barcy F. McNeal, Secretary

Betty McCauley, Acting Secretary

Tanowa M. Troupe, Acting Secretary

Certificate Expires: December 15, 2014

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business
Technician 3 Date Processed **NOV 17 2012**

CRS AUTOMATIC CASE ACTION FORM

Case No. 12-2983-EL-CRS

Date Sent: December 17, 2012

Effective Date of Certificate: December 15, 2012

Certificate Expires: December 15, 2014

Company Name and Company Name d/b/a: **Star Energy Partners, LLC**

Renewal

Action Needed:

Issue Certificate Number to: **Star Energy Partners, LLC** at (address): **3340 West Market Street, Akron, Ohio 44333**

Certified To Provide the Following Services:

- Retail Generation
- Aggregation
- Power Marketer
- Power Broker
- Governmental Aggregation

Renew Certificate No. to

Revise Certificate No. to (check all applicable):

Reflect name change from to

Reflect address change from to

Add new service offering to certificate:

- Retail Generation
- Aggregation
- Power Marketer
- Power Broker
- Governmental Aggregation

Correct Administrative Error

Reflect Change of Ownership to:

Cancel Certificate No.

Protect Un-redacted copies until

Close Case File, Case Withdrawn at Applicant's Request

Close Case File

CASE NUMBER: 12-2983-EL-CRS
CASE DESCRIPTION: STAR ENERGY PARTNER LLC
DATE OF SERVICE: 12/17/2012
DOCUMENT SIGNED ON: 12/17/2012

Sign Here: 

	APPLICANT	
PARTY OF RECORD		ATTORNEY
STAR ENERGY PARTNERS LLC	NONE	
SANDY MURPHY, CORP. SECRE		
3340 WEST MARKET STREET		
AKRON ,OH 44333		
Phone:330-835-2664		
Email:SMURPHY@FIRSTCOMM.COM		

FILE

3

The Public Utilities Commission of Ohio Ohio Competitive Retail Natural Gas Marketer Certificate

Issued pursuant to Case Number(s):
14-0905-GA-CRS

is
Ohio Competitive Retail Natural Gas Aggregator/Broker Certificate Number:
14-361G(1)

Granted to:
Star Energy Partners, LLC

Whose office or principal place of business is located at:
3340 West Market Street, Akron, OH 44333

And is hereby certified to provide:
Retail Natural Gas Marketer Services
within the state of Ohio, for a two-year period.

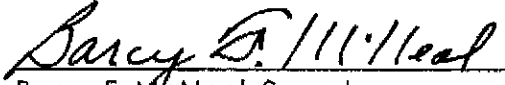
Certification Effective:
June 19, 2014 through June 19, 2016

The certification of Ohio competitive retail natural gas marketers is governed by Chapter 4901:1-27 of the Ohio Administrative Code and section 4929.20 of the Ohio Revised Code.

This Certificate is revocable if all of the conditions set forth in the aforementioned case(s) as well as those under law, are not met.

Certified entity is subject to all rules and regulations of the commission, now existing or hereafter promulgated.

Witness the seal of the Commission affixed at Columbus, Ohio
Dated: **6/20/2014**

By Order of
The Public Utilities Commission of Ohio

Barcy F. McNeal, Secretary
Tanowa M. Troupe, Acting Secretary
Felecia D. Burdett, Acting Secretary

CRNGS AUTOMATIC CASE ACTION FORM

Case No. **14-0905-GA-CRS**

Date Sent: **June 18, 2014**

Effective Date of Certificate: **June 19, 2014**

Certificate Expires: **June 19, 2016**

Company Name and Company Name d/b/a: **Star Energy Partners, LLC**

Renewal

Action Needed:

Issue Certificate Number **14-361G(1)** to: **Star Energy Partners, LLC** at
(address): **3340 West Market Street, Akron, OH44333**

Certified To Provide the Following Services:
 Retail Generation
 Aggregation
 Retail Natural Gas Marketer Services
 Retail Natural Gas Brokerage Services
 Governmental Aggregation

Renew Certificate No. to

Revise Certificate No. to (check all applicable):

Reflect name change from to

Reflect address change from to

Add new service offering to certificate:

Retail Generation
 Aggregation
 Power Marketer
 Power Broker
 Governmental Aggregation

Correct Administrative Error

Reflect Change of Ownership to:

Cancel Certificate No.

Protect Un-redacted copies until

Close Case File, Case Withdrawn at Applicant's Request

Close Case File

CASE NUMBER: 14-0905-GA-CRS
CASE DESCRIPTION: STAR ENERGY PARTNERS LLC
DATE OF SERVICE: 6/20/2014
DOCUMENT SIGNED ON: 6/20/2014

Sign Here: *JMA*

APPLICANT

PARTY OF RECORD

ATTORNEY

STAR ENERGY PARTNERS LLC CONTRACT ADMIN NONE
 JEFFREY GIANNANTONIO
 3340 W MARKET ST
 AKRON, OH 44333
 Phone: (330) 835-2459
 Email: JGIANNANTONIO@FIRSTCOMM.COM

Schedule 8.a.iii.

Schedule 8.a.iii.

Type and Number of Customers in other jurisdictions

Star Energy Partners is currently only licensed in Ohio as a Competitive Electric and Natural Gas Supplier. We currently do not have any natural gas customers. However, we do have a total of 10,393 electric customers, as detailed below.

<u>Type of Customer</u>	<u>No. of Customers</u>
Residential	10,198
Commercial	195

Schedule 8.a.iv. to Schedule 8.a.v.

CONFIDENTIAL

Schedule 8.a.vi.

DECLARATION OF AUTHORITY

This Declaration of Authority ("Declaration") is a statement and certification made this 7th day of FEBRUARY, 20 13 by FIRST ENERGY SOLUTIONS CORP. ("Party A") and STAR ENERGY PARTNERS LLC ("Party B") for the benefit of PJM Interconnection, LLC.

RECITALS:

WHEREAS, PJM is a Regional Transmission Organization ("RTO") subject to the jurisdiction of the Federal Energy Regulatory Commission, ("FERC");

WHEREAS, PJM Settlement, Inc ("PJM Settlement") is a Pennsylvania Non-Profit Corporation, incorporated for the purpose of providing billing and settlement functions and credit and risk management functions for PJM. References to "PJM" in this Declaration are intended to apply to PJM and/or PJM Settlement, as appropriate, with regard to their respective functions.

WHEREAS, PJM and PJM Settlement administer centralized markets that clear various electric energy and energy-related products among multiple buyers and sellers;

WHEREAS, PJM additionally exercises operational control over its members' transmission facilities whereby PJM provides control area functions, including economic dispatch, the scheduling of transmission service and emergency response to ensure reliability across an integrated transmission system; and

WHEREAS, in capacities more fully described below, PARTY A (a PJM Member) and PARTY B seek to participate either directly or indirectly in the markets administered by PJM or engage in operations that use or affect the integrated transmission system operated by PJM.

DECLARATION

NOW, THEREFORE, acknowledging that PJM will rely on the truth, accuracy and completeness of the statements made below, PARTY A and PARTY B, as indicated below, provide the following certifications:

1. Acting as PJM's Counterparty

- (a) PARTY A hereby certifies that in all activities with PJM regarding PARTY A's provision of energy, capacity, ancillary services, scheduling and procurement of transmission service, congestion management and all other required products and services necessary to serve PARTY B's load, whether such load is retail or wholesale, PARTY A is acting as PJM's

counterparty and shall be billed and be primarily liable to PJM for all costs associated in its procurement of such products and services.

- (b) PARTY A hereby certifies that in all activities with PJM regarding PARTY A's bidding, sale, scheduling, dispatch, and delivery of energy, capacity and ancillary services from generation owned by PARTY B, PARTY A is acting as PJM's counterparty and is entitled to receive from PJM in its name all revenues associated with its sales of such products and services.
- (c) PARTY B hereby certifies that it is fully authorized to assign, and has in fact assigned pursuant to a binding, legally enforceable agreement, to PARTY A the rights to PARTY B's generation described in paragraph 1(b) above. In this regard, PARTY B acknowledges that PARTY A in acting as PJM's counterparty is authorized to communicate and transact with PJM exclusively as though PARTY A was the owner and operator of this generation. Furthermore, PARTY B acknowledges that PJM can communicate and transact directly with PARTY A in acting as PJM's counterparty, including directing PARTY B's generation in the event of system emergencies, as though PARTY A was the owner and operator of this generation. PARTY B accepts that it will follow any such direction issued by PJM through PARTY A affecting operation of its generation in the event of system emergencies.

2. Reliance By PJM On Certifications.

- (a) Each of PARTY A and PARTY B recognizes and accepts that PJM is relying on the truth, accuracy and completeness of the certifications herein made in making its assessments as to creditworthiness and in assuring PJM's own compliance with its tariff, operating agreement, reliability agreement and business practices.
- (b) Each of PARTY A and PARTY B recognizes and accepts that each has a continuing duty to notify PJM if and when the certifications herein made cease to be accurate or complete. Written notice of changes to the certifications and/or identification of units herein must be provided by PARTY A (PJM Member) to PJM at least thirty days in advance of their effectiveness. If PARTY B is also a PJM Member, then both parties must provide thirty days prior written notification in order for such changes to be effective. Such notification is required for changes to certifications, identification of units and/or termination of this Declaration. Furthermore, PARTY B must establish at least 30 days prior to termination, sufficient credit with PJM to assume responsibility for all transactions for which it will be responsible for after the termination. Should less than thirty days notice be provided, PJM shall use its best efforts to accommodate and process the declarations herein, but all attempts should be made to provide such notice. Upon such termination, all rights, responsibilities and accounts will revert back to the status quo prevailing before the

Declaration became effective. Unless such written notice is received and credit is established, PJM shall be entitled to rely perpetually on this Declaration as governing its relationship with PARTY A and PARTY B as to the subject matter of this Declaration.

3. Advance Notice to PJM of Proposed Deactivation of Unit

Should PARTY B intend to deactivate any unit in the PJM region, it will provide advance notice to PJM, either directly or through PARTY A, in accordance with Part V of the PJM Open Access Transmission Tariff ("OATT") and otherwise adhere to the process applicable to the deactivation of generating units in the PJM region as set forth in Part V of the PJM OATT.

4. Identification of Unit(s)

Pursuant to this Section, PARTY A has been authorized as Principal for the following specific units:

Resource Name:

Resource ID:

IN WITNESS WHEREOF, PARTY A and PARTY B execute this Declaration to be effective as of the date written above.

PARTY A

Signature: [Handwritten Signature]

Name: Kevin Warvell

Title: Vice President

Company Name: FirstEnergy Solutions

PARTY B

Signature: [Handwritten Signature]

Name: Tony C. Banks

Title: PRESIDENT & CEO

Company Name: STAR ENERGY PARTNERS, LLC

STATE OF OHIO
COUNTY OF SUMMIT

§
§

DP&L PJM AFFIDAVIT

1. My name is C. James Davis. I am Dir., Structuring and Pricing of First Energy Solution ("Company");
2. I swear or affirm that I have personal knowledge of the facts stated in this Affidavit, that I am competent to testify to them, and that I have the authority on behalf of First Energy Solution. I further swear or affirm that all of the statements and/or representations made in this Affidavit are true, complete and correct;
3. Star Energy Partner LLC is a certified Competitive Retail Electric Service Provider, with the Public Utilities Commission of Ohio (Certificate Number 12-613E (1));
4. First Energy Solution is Star Energy Partner LLC's PJM scheduling coordinator; and
5. By this Affidavit, First Energy Solution, as Star Energy Partner LLC's PJM scheduling coordinator, hereby certifies that it will use PJM Network Integration Transmission Service to serve retail load in DP&L's certified territory.

C. James Davis
Signature of Affiant/Responsible Party

C. JAMES DAVIS
Typed or Printed Name

FIRST ENERGY SOLUTIONS
Name of Company

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 12 day of February, 2012.^{3mas}

Marlo A. Savila
Notary Public in and for the
State of Ohio



Marlo Savila
Resident Summit County
Notary Public, State of Ohio
My Commission Expires:

Marlo A. Savila.
Resident Summit County
Notary Public, State of Ohio
My Commission Expires: 7/27/2015

Schedule 8.d.

Schedule 8.d.

Oversight of Marketing

Star Energy Partners requires that all D2D agents sign the attached Code of Conduct. Additionally a D2D agent must pass a Quality Exam with at least a 90% score, have a clear drug screening, and a clear background check prior to being activated for sales on our campaigns. Star Energy Partners has an established Quality Assurance team (Star Customer Operations and D2D QA) that verifies all of the information and oversees the Code of Conduct compliance.

STAR ENERGY PARTNERS – INDEPENDENT SALES AGENT CODE OF CONDUCT

Star Energy Partners LLC (“Star Energy”) and **Cydcor, Inc.**, Direct Marketing Organization (“DMO”), are committed to conducting business at the highest legal, ethical and moral standard. Star Energy and DMO adhere to these tenets and believe that it is a good business practice to behave in such a manner, as well as an effective way to protect consumers. This Code of Conduct embodies and reflects these beliefs. As a DMO or independent agent, you are expected to fully read, understand and comply with this Code of Conduct at all times. Failure to do so will result in immediate termination of your contractor status with Star Energy.

- All marketing presentations must be honest and clear so that the customer clearly understands their options and selection of Star Energy.
- You must convey all material information to the consumer as approved by Star Energy.
- You may not omit information necessary for the customer to make an informed decision about whether to switch from their current electricity or natural gas supplier to Star Energy.
- You must adhere to the marketing script provided and all information must be fully conveyed.
- In the event you stop working on the Star Energy campaign, you agree to immediately stop using Star Energy marketing materials and/or uniforms, and return all such materials and uniforms to DMO within 7 days. You further agree that DMO can withhold the costs of any unreturned items from any commissions that may be due to you. Such withheld amounts will be used to reimburse Star Energy for items not returned.

Star Energy would rather lose a sale than have a customer sign up without full knowledge and a willingness to participate in our program. Customer satisfaction is required.

Your Responsibilities

- Review and understand all training and marketing materials provided by Star Energy.
- Be familiar with relevant law governing the sale of electricity or natural gas in your state that has been provided to you by DMO.
- Be familiar with consumer education materials provided to you by DMO regarding energy deregulation.
- Never attempt to solicit a customer who speaks another language in which you are not fluent and for which you do not have materials written in their language.
- Stay in contact with your manager on a regular basis.
- Bring grievances to your manager’s attention immediately.
- Complete all necessary paperwork correctly and legibly.
- Clearly educate customers as to their choices for selecting an alternative energy supplier (i.e. Star Energy).

Responsibilities To The Customer

- NEVER misrepresent your association with any electricity or natural gas supplier or local utility.
- NEVER exaggerate or speculate regarding potential savings.
- NEVER make statements that are untrue or misleading.
- ALWAYS be polite and professional, even if the customer is unpleasant.
- ALWAYS answer the customer’s questions responsively and effectively, to the best of your ability. Ensure that the customer is satisfied with your response. If the customer’s questions pertain to information specific to other suppliers, refer those questions to the appropriate party or parties.

General Guidelines For Appropriate Conduct

A sales representative's conduct reflects on the company they are representing, consequently, you are encouraged to demonstrate the highest standard of professionalism, ethical conduct and integrity at all times. The following shall apply to all sales persons involved with the Star Energy Campaign.

- DO make sure you are conducting yourself in a professional manner during all of your interactions with customers and prospective customers;
- DO make sure you have the proper permits with you before entering a territory, if required;
- DO have your Star Energy ID badge displayed clearly on your outermost layer of clothing at all times;
- DO wear your Star Energy attire at all times in the field (if applicable);
- DO dress appropriately/professionally at all times;
- DO contact your manager immediately if you are confronted by the police for any reason (or a customer who states that they will/may contact the police);
- DO add the customer to the Do Not Knock list, if the customer makes this request, and bring this to your manager's attention immediately;
- DO walk away from any sale if the customer is or appears:
 - Not to be an authorized decision maker—the account holder or account holder's spouse
 - Under age
 - Incapable/confused/elderly
 - Intoxicated
 - To have any sort of a language barrier
- DO ask permission from customers before using their name as a reference for Jones Effect;
- DO leave the premises upon the request of the resident/customer;
- DO complete and review all the paperwork with the customer before making the call to TPV;
- DO tell the customer what to expect on the TPV call before the order is placed;
- DO leave the customer's premise during the customer portion of the TPV;
- DO leave the customer's utility bill with the customer;
- DO explain that you are a representative of Star Energy and NOT with the utility;
- DON'T approach any residential property that has a "No Solicitation" sign;
- DON'T approach any property with obvious hazards or properties you are uncomfortable with;
- DON'T switch a customer's service without authorization (i.e. slamming);
- DON'T allow unauthorized people to switch/enroll the account;
- DON'T misrepresent to consumers regarding Star Energy's services, pricing or its affiliation with any distribution company or government agency;
- DON'T discriminate any marketing practices;
- DON'T commit fraud of any kind;
- DON'T impersonate a customer during a Third Party Verification, or have another person impersonate a customer during a Third Party Verification;
- DON'T allow someone to use your agent code or call in place of you for any reason—even when training;
- DON'T represent multiple companies simultaneously;
- DON'T use any information regarding customers, contracts, programs or materials adversely against Star Energy on behalf of any future company;
- DON'T show customers or leave behind any materials that have not been approved by Star Energy

- DON'T mishandle a customer's account or other confidential information;
- DON'T possess dangerous or unauthorized materials, such as explosives, firearms, or any other weapon, while in the field;
- DON'T smoke or drink on the job, or use profanity with or in front of the customer or while in the field;
- DON'T use obscene, threatening, or abusive language, intimidation, or threats of harm to a customer, even if provoked or initiated by a customer;
- DON'T act in any sexual, unlawful and/or unwelcoming harassing manner toward customers or co-workers;
- DON'T fail to comply with any applicable law or regulation;
- DON'T state that you are representing anyone other than Star Energy;
- DON'T enter a customer's home for any reason;
- DON'T enroll any apartment, condo or trailer service locations;
- DON'T advise or speculate on cancellation fees or contract/agreement terms with other suppliers;
- DON'T make any verbal offers or guarantees other than those specifically documented by Star Energy;
- DON'T contact the utility on behalf of the customer;
- DON'T promise savings to the customer;
- DON'T enroll existing Star Energy customers;
- DON'T enroll anyone without a valid telephone number that belongs to them. The BTN entered for enrollment must meet these qualifications;
- DON'T contact a customer for any reason or in any form if you received a complaint from them.

I have read and agree to abide by the terms of the Star Energy Partners Independent Sales Agent Code of Conduct. I understand that failure to abide by the Code of Conduct will result in the termination of my contractor status with Star Energy.

Sales Representative Signature

Date

Print Agent Name

Agent ID

Schedule 8.e.

CONFIDENTIAL

Schedule 8.f.

FEDERAL ENERGY REGULATORY COMMISSION
Washington, D.C. 20426

OFFICE OF ENERGY MARKET REGULATION

In Reply Refer To:
Star Energy Partners LLC
Docket No. ER13-281-000

December 14, 2012

Ms. Natara G. Feller, Esquire
Attorney for Star Energy Partners LLC
The Law Office of Natara G. Feller
540 President Street, 3rd Floor
Brooklyn, New York 11215

Reference: Market-Based Rate Authorization

Dear Ms. Feller:

On November 1, 2012, as amended on November 23, 2012, you filed on behalf of Star Energy Partners LLC (Star Energy) an application for market-based rate authority with an accompanying tariff. The proposed market-based rate tariff provides for the sale of energy, capacity, and ancillary services at market-based rates.¹ Star Energy requests waivers commonly granted to similar market-based rate applicants.

Your filings were noticed on November 1, 2012 and December 4, 2012, with comments, protests or interventions due on or before November 23, 2012 and December 10, 2012, respectively. None was filed.

Pursuant to the authority delegated to the Director, Division of Electric Power Regulation - West, under 18 C.F.R. § 375.307, your submittals filed in the referenced docket are accepted for filing, effective November 20, 2012, as requested. Based on your

¹ Star Energy requests authorization to sell ancillary services in the markets administered by PJM Interconnection, L.L.C. (PJM), New York Independent System Operator, Inc. (NYISO), ISO New England Inc. (ISO-NE), California Independent System Operator Corp. (CAISO), and Midwest Independent Transmission System Operator, Inc. (MISO). Star Energy also requests authorization to engage in the sale of certain ancillary services as a third-party provider in other markets.

representations, Star Energy meets the criteria for a Category 1 seller in all regions and is so designated.²

You state that Star Energy is located in Akron, Ohio, and intends to act as a power marketer. You further represent that Star Energy is owned by an individual and FC Energy LLC, and it is not affiliated with any entity that owns or controls generation or transmission facilities. Further, you affirmatively state that Star Energy has not erected barriers to entry and will not erect barriers to entry into the relevant market.

You state that Star Energy is seeking Category 1 status in all regions. You state that Star Energy neither owns nor is affiliated with any generation or transmission facilities. You further state that Star Energy is neither affiliated with a franchised public utility nor raises other vertical market power issues. Therefore, you state that Star Energy satisfies the Commission's criteria for Category 1 status in all regions.

Market-Based Rate Authorization

The Commission allows power sales at market-based rates if the seller and its affiliates do not have, or have adequately mitigated, horizontal and vertical market power.³

Based on your representations, Star Energy's submittals⁴ satisfy the Commission's requirements for market-based rate authority regarding horizontal and vertical market power.

Star Energy's request for waiver of Subparts B and C of Part 35 of the Commission's regulations requiring the filing of cost-of-service information, except for

² *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, Order No. 697, FERC Stats. & Regs. ¶ 31,252, at P 848-50, *clarified*, 121 FERC ¶ 61,260 (2007), *order on reh'g*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268, *clarified*, 124 FERC ¶ 61,055, *order on reh'g*, Order No. 697-B, FERC Stats. & Regs. ¶ 31,285 (2008), *order on reh'g*, Order No. 697-C, FERC Stats. & Regs. ¶ 31,291 (2009), *order on reh'g*, Order No. 697-D, FERC Stats. & Regs. ¶ 31,305 (2010), *aff'd sub nom. Mont. Consumer Counsel v. FERC*, 659 F.3d 910 (9th Cir. 2011), *cert. denied sub nom. Pub. Citizen, Inc. v. FERC*, 133 S. Ct. 26 (2012).

³ Order No. 697, FERC Stats. & Regs. ¶ 31,252 at P 62, 399, 408, 440.

⁴ The next time you make a market-based rate filing with the Commission, you must include a revised tariff in compliance with Appendix C – Limitations and Exemptions Regarding Market-Based Rate Authority to include appropriate citations. *Niagara Mohawk Power Corporation*, 121 FERC ¶ 61,275 (2007) at P 8. *See also*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268 at P 384.

sections 35.12(a), 35.13(b), 35.15 and 35.16 is granted. Star Energy's request for waiver of Part 41, Part 101, and Part 141 of the Commission's regulations concerning accounting and reporting requirements is granted with the exception of 18 C.F.R. §§ 141.14 and 141.15.⁵ Notwithstanding the waiver of the accounting and reporting requirements here, Star Energy is expected to keep its accounting records in accordance with generally accepted accounting principles.

Star Energy requests blanket authorization under Part 34 of the Commission's regulations for all future issuances of securities and assumptions of liability. A separate notice was published in the Federal Register establishing a period during which protests could be filed. None was filed. Star Energy is authorized to issue securities and assume obligations or liabilities as guarantor, indorser, surety, or otherwise in respect of any security of another person; provided that such issue or assumption is for some lawful object within the corporate purposes of Star Energy, compatible with the public interest, and reasonably necessary or appropriate for such purposes.⁶

Star Energy must file electronically with the Commission Electric Quarterly Reports.⁷ Star Energy further must timely report to the Commission any change in status that would reflect a departure from the characteristics the Commission relied upon in granting market-based rate authority in accordance with Order No. 697.⁸

This action does not constitute approval of any service, rate, charge, classification, or any rule, regulation, or practice affecting such rate or service provided for in the filed documents; nor shall such action be deemed as recognition of any claimed contractual

⁵ *Citizens Energy Corp.*, 35 FERC ¶ 61,198 (1986); *Citizens Power and Light Corp.*, 48 FERC ¶ 61,210 (1989) (*Citizens Power*); *Enron Power Marketing, Inc.*, 65 FERC ¶ 61,305 (1993), *order on reh'g*, 66 FERC ¶ 61,244 (1994) (*Enron*).

⁶ *Citizens Power*, 48 FERC ¶ 61,210; *Enron*, 65 FERC ¶ 61,305.

⁷ *Revised Public Utility Filing Requirements*, Order No. 2001, FERC Stats. & Regs. ¶ 31,127, *reh'g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reh'g denied*, Order No. 2001-B, 100 FERC ¶ 61,342, *order directing filing*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002), *order directing filing*, Order No. 2001-D, 102 FERC ¶ 61,334 (2003). Attachments B and C of Order No. 2001 describe the required data sets for contractual and transaction information. Public utilities must submit Electric Quarterly Reports to the Commission using the EQR Submission System Software, which may be downloaded from the Commission's website at <http://www.ferc.gov/docs-filing/eqr.asp>.

⁸ *Reporting Requirement for Changes in Status for Public Utilities with Market-Based Rate Authority*, Order No. 652, FERC Stats. & Regs. ¶ 31,175, *order on reh'g*, 111 FERC ¶ 61,413 (2005); 18 C.F.R. § 35.42 (2012).

right or obligation affecting or relating to such service or rate; and such acceptance is without prejudice to any findings or orders which have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against any of the applicant(s).

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713.

Questions regarding the above order should be directed to:

Federal Energy Regulatory Commission
Attn: Michelle Barnaby
Phone: (202) 502-8407
Office of Energy Market Regulation
888 First Street, N.E.
Washington, D.C. 20426

Sincerely,

Steve P. Rodgers, Director
Division of Electric Power
Regulation - West